

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
WAYCROSS DIVISION

COALITION FOR GOOD  
GOVERNANCE and DONNA  
CURLING,

Plaintiffs,

v.

COFFEE COUNTY BOARD OF  
ELECTIONS AND REGISTRATION,

Defendant.

Civil Action No. 5:23-mc-00001-  
LGW-BWC

In RE Subpoenas issued by the  
United States District Court  
For the Northern District of  
Georgia, Atlanta Division,  
Civil Action File No. 1:17-CV-  
2989-AT

**PLAINTIFFS' MOTION FOR FURTHER EXTENSION OF TIME**

In its January 18, 2024 Order (the "Order"), granting in part and denying in part Plaintiffs' Motion for Extension of Time, the Court directed Plaintiffs to file any motion challenging Defendant's privilege assertions on or before January 22, 2024 and to file its motion for sanctions by February 19, 2024.

Lead counsel in this matter, Cary Ichter, has not been lead counsel in the *Curling* matter and needs input from the *Curling* lawyers to complete the challenge of privilege designations. When the Order was issued, counsel

expected the deadline for challenging privilege designations would be workable because counsel expected Plaintiffs would have rested their case in the *Curling* trial by Friday, January 19, 2024 at the latest and that the following weekend could be dedicated to completion of the privilege challenges.

As often happens with trials, the *Curling* case has had some speed bumps that have slowed the progress of the case. In particular, two unforeseen situations have caused delay. First, throughout the pretrial process there have been two plaintiff groups (*Curling* and CGG), but a third plaintiff (Ricardo Davis) has been pursuing issues and witnesses outside of the original plaintiff groups' control, which has introduced delay. Additionally, late breaking discovery issues have unexpectedly had to be litigated during the case, interrupting the *Curling* plaintiffs' timing.

The *Curling* Plaintiffs expect to rest this week and should have the time and ability to deal with the privilege designations at that time. Hence, Plaintiffs are requesting an additional week, to and through January 29,

2024, to challenge privilege designations. Plaintiffs are *not* requesting an extension of the deadline for filing a sanctions motion.

Respectfully submitted this 22nd day of January 2024.

/s/ William Daniel Davis

WILLIAM DANIEL DAVIS

Georgia Bar No. 746811

CARY ICHTER, *Pro Hac Vice*

Georgia Bar No. 382515

ddavis@ichterdaivs.com

cichter@ichterdavis.com

**ICTER DAVIS LLC**

400 Interstate N. Pkwy, SE, Suite 860

Atlanta, Georgia 30339

(404) 869-7600

*Attorneys for Coalition for Good Governance*

and

/s/ Bruce P. Brown

BRUCE P. BROWN

Georgia Bar No. 064460

bbrown@brucepbrownlaw.com

**BRUCE P. BROWN LAW LLC**

1123 Zonolite Rd. NE, Suite 6

Atlanta, Georgia 30306

(404) 881-0700

*Attorneys for Coalition for Good Governance*

and

/s/ Halsey G. Knapp, Jr.

HALSEY G. KNAPP, JR.

Georgia Bar No. 425320

hknapp@khlawfirm.com

**KREVOLIN & HORST, LLC**

1201 West Peachtree Street, NW

Suite 3250

Atlanta, Georgia 30309

(404) 888-9700

*Attorneys for Donna Curling*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2024, a copy of the foregoing *Plaintiffs' Motion for Further Extension of Time* was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send notification of such filing to all attorneys of record.

/s/ William Daniel Davis

William Daniel Davis

Georgia Bar No. 382515

ddavis@ichterdavis.com

**ICHTER DAVIS LLC**

400 Interstate N. Pkwy, SE,  
Suite 860

Atlanta, Georgia 30339

(404) 869-7600

*Attorneys for Coalition for Good  
Governance*